Davis, 147 Iowa 441; *Busby* v. *Busby*, 137 Iowa 37; *Crockett* v. *Cohen*, 82 W. Va. 284; *Blodgett* v. *Perry*, 97 Mo. 263; and *Cantley* v. *Morgan*, 41 S. E. 201.

ADVERSE POSSESSION—RECOGNITION OF TITLE IN ANOTHER—TACKING.—Plaintiff sought to quiet title to land on theory of adverse possession, the defendant holding the title of record. One A had been in possession in 1880 as tenant of one S. In 1903 S deeded the land to A but description did not include the land in question. Plaintiff derived title from A. *Held*, plaintiff has failed to show title in himself and so his action cannot be maintained. *Wilhelm* v. *Herron* (Mich., 1920), 178 N. W. 769.

It is a peculiar circumstance that the plaintiff, having so many plausible theories on which he might succeed was unable to succeed on any one of them. While it is true that A's possession as a tenant was the possession of S, yet as to everyone else it was hostile and so might ripen into title. *Skipwith* v. *Martin*, 50 Ark. 141. In the principal case, this possibility was denied and the court held that if anyone got title it was S. The plaintiff further contended that the adverse possession of A should be tacked to that of S and this contention may be supported either by the Kentucky theory that tacking does not require privity, *Shannon* v. *Kinney*, 1 A. K. Marsh 3, or by the doctrine that even though privity be necessary, continuity of possession by mutual consent is sufficient; *McNeely* v. *Langan*, 22 Oh. St. 32. Finally, the plaintiff being in possession, and title conceded to have been in S, as against everyone else, he might well be entitled to a decree quieting title. The court did not apply the doctrine that possession is good against the whole world except the true owner but maintained that as against the title of record, the plaintiff must show title in himself.

BAILMENTS—GRATUITOUS BAILOR NEED ONLY WARN OF DEFECTS OF WHICH HE KNOWS.—An owner of a motortruck gratuitously lent it to an employee to attend a celebration. One riding in the truck on invitation of the borrower was killed due to a defect in the body of the truck. In an action to recover damages from the bailor, *held*, the owner was not liable for failure to warn of defects of which he did not know even though he might well have known them. *Johnson* v. *H. M. Bullard Co.* (Conn., 1920), 111 Atl. 70.

Cases involving the duties and liabilities of the gratuitous bailor are few. Before the law was settled in England as to the liability of such a bailor for defects in the bailed chattel which were unknown to him, it had been decided that concealment of known defects would make him liable. *Levy* v. *Langridge*, 4 M. & W. 337; *Winterbottom* v. *Wright*, 10 M. & W. 107. When the question arose in *Blakemore* v. *Bristol & Exeter Ry. Co.*, 8 Ellis & B. 1035, as to the bailor's liability for unknown defects, the court accepted the principles which Pothier and Story had drawn from the Roman law, and held the bailor not liable. Thus we have another illustration of the influence of the Roman law upon the English law of bailments. As is pointed out in the *Blakemore* case the fact that the bailor received nothing for the use of his chattel, should render him less liable than if the bailment were for the mutual benefit of both parties. It is settled that in a bailment for hire, the